

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
RED RIVER TALC LLC, ¹)	Case No. 24-90505 (CML)
)	
Debtor.)	
)	

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS AND
NOTICE OF WITHDRAWAL OF PRIOR REPRESENTATION**

PLEASE TAKE NOTICE that Paul Hastings LLP (“Paul Hastings”) has previously appeared for the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”) in the above-referenced chapter 11 case (the “Chapter 11 Case”). Paul Hastings has withdrawn as counsel for the AHC of Supporting Counsel effective as of November 15, 2024, and hereby withdraws its appearance in the Chapter 11 Case as counsel for the AHC of Supporting Counsel. Paul Hastings, subject to approval of its retention by the Court, now hereby submits its appearance as co-lead bankruptcy counsel to the Official Committee of Talc Claimants (the “TCC”) and, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), and Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), requests that all notices given or required to be

¹ The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

given in this Chapter 11 Case, and all papers served or required to be served in the Chapter 11 Case, be given and served upon:

PAUL HASTINGS LLP

Schlea M. Thomas
600 Travis Street, 58th Floor
Houston, Texas 77002
Telephone: (713) 860-7300
Email: schleathomas@paulhastings.com

-and-

Kristopher M. Hansen
Kenneth Pasquale
Ryan P. Montefusco
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Email: krishansen@paulhastings.com
kenpasquale@paulhastings.com
ryanmontefusco@paulhastings.com

-and-

Matthew M. Murphy
71 S. Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Email: mattmurphy@paulhastings.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand is not only for the notices and papers referred to in the sections of the Bankruptcy Code and the Bankruptcy Rules specified above, but also includes, without limitation, any and all orders and notices of any application, motion, petition, complaint, demand, request, or other pleading in the Chapter 11 Case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically, or otherwise filed with or delivered to the Bankruptcy Clerk, Court, or Judge (as those terms are defined in Bankruptcy Rule 9001), which affects the TCC.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any later appearances, pleadings, proofs of claim, claims, or suits filed in the Chapter 11 Case, shall be deemed or construed as a waiver of: (i) any rights of the TCC to (a) have final orders in any non-core matters entered only after de novo review by the United States District Court for the Southern District of Texas (the “District Court”), (b) trial by jury in any proceeding so triable in the Chapter 11 Case or any case, controversy, or proceeding related to the Chapter 11 Case, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (ii) any other rights (including setoff and recoupment), claims, actions, and defenses of the TCC either in law or in equity, under any agreements or otherwise, all of which rights, claims, actions, and defenses are expressly reserved.

[Remainder of Page Intentionally Left Blank]

Dated: November 26, 2024
Houston, Texas

Respectfully submitted

/s/ Schlea M. Thomas

PAUL HASTINGS LLP

Schlea M. Thomas (TX Bar No. 24131710)
600 Travis Street, 58th Floor
Houston, Texas 77002
Telephone: (713) 860-7300
Facsimile: (713) 353-3100
Email: schleathomas@paulhastings.com

-and-

Kristopher M. Hansen (*admitted pro hac vice*)
Kenneth Pasquale (*admitted pro hac vice*)
Ryan P. Montefusco (*admitted pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: krishansen@paulhastings.com
kenpasquale@paulhastings.com
ryanmontefusco@paulhastings.com

-and-

Matthew M. Murphy (*admitted pro hac vice*)
71 S. Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100
Email: mattmurphy@paulhastings.com

*Proposed Co-Lead Bankruptcy Counsel for the Official
Committee of Talc Claimants*

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on November 26, 2024.

/s/ Schlea M. Thomas

Schlea M. Thomas